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January 16, 2025

Via: ECF

Magistrate Judge Miroslav Lovric
Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

**Re: Shara v. Binghamton Precast & Supply Corp. et al., 3:23-cv-135
Status Report**

Dear Judge Lovric:

The parties submit this joint status report pursuant to your most recent text order. The parties mutually request a brief, off the record, phone call or video conference to discuss the discovery timeline and the extenuating circumstances we believe exist to justify an additional extension of the discovery timeline. The parties continue to work collaboratively in completing discovery but have been unable to complete discovery to date.

Very truly yours,
COUGHLIN & GERHART, LLP


By Angelo D. Catalano

cc: Adam Sackowitz, Esq., Via ECF